

September 7, 2004

Steve Zappe
New Mexico Environment Department
2905 Rodeo Park Drive, Building 1
Santa Fe, NM 87505



RE: DOE High-Level Waste WIPP Permit Modification request

Dear Mr. Zappe:

The undersigned organizations are strongly opposed to high-level waste (HLW) storage or disposal at the Waste Isolation Pilot Plant (WIPP). HLW is extremely dangerous and should not ever be allowed at WIPP. Further, HLW is prohibited by federal law for storage or disposal at WIPP.

We urge the New Mexico Environment Department (NMED) to include a clear prohibition in the WIPP operating permit against any waste that has been classified or managed as HLW by the Department of Energy (DOE) from being stored or disposed at WIPP. NMED should not allow any of the HLW that DOE "renames@ to be stored or disposed at WIPP.

NMED must not approve the DOE's incomplete permit modification request related to tank waste, which is inadequate to protect public health and safety.

The DOE request does not specifically include all of the more than 100 million gallons of liquid waste and sludge stored in 243 tanks at Hanford, Washington, the Savannah River Site (SRS) in South Carolina, and the Idaho National Engineering and Environmental Laboratory (INEEL) or the sludges from high-level waste and spent fuel storage at those sites. For decades, the highly radioactive waste in those tanks has been considered to be extremely dangerous. Such wastes would endanger present and future generations and are not appropriate for storage or disposal at WIPP.

The 1992 federal law clearly prohibits high-level waste at WIPP. At the time that law was passed, Congress understood that the waste in the tanks at Hanford, SRS, and INEEL were prohibited from WIPP. Congress has not changed that law and DOE and NMED should abide by the law.

Moreover, such HLW would be transported through much of the state, threatening the health and safety of thousands of New Mexicans.

Thus, we strongly oppose HLW at WIPP. We strongly urge the NMED to prohibit any waste that has been classified or managed as HLW from being stored or disposed at WIPP.

Thank you very much for your consideration of our comments.

Sincerely,

Albuquerque Center for Peace and Justice
Maria Santelli, Coordinator
202 Harvard, SE
Albuquerque, NM 87106

040909



Amigos Bravos
Brian Shields, Executive Director
P.O. Box 238
Taos, NM 87571

Citizen Action New Mexico
Sue Dayton, Director
P.O. Box 1133
Sandia Park, NM 87047

Citizens for Alternatives to Radioactive Dumping
Janet Greenwald
202 Harvard SE
Albuquerque, NM 87106

Citizens for Environmental Safeguards
Elaine Cimino
49 Camino Torcido
Santa Fe, NM 87507

Colonias Development Council
Diana Bustamante
1050 Monte Vista
Las Cruces, NM 88001

Concerned Citizens for Nuclear Safety
Joni Arends, Executive Director
107 Cienega
Santa Fe, NM 87501

Creative Commotion: Voices for Social Change
Coila Ash, Director
325 E. Coronado Road #2
Santa Fe, New Mexico 87505

Loretto Community
Penny McMullen
324 Sanchez St.
Santa Fe, NM 87505

New Mexico Conference of Churches, Sustainable Futures Task Force
Stan Euston, Environmental Program Director
750 Vassar, NE
Albuquerque, NM 87106

New Mexico Environmental Law Center
Doug Meiklejohn, Executive Director
1405 Luisa Street, Suite 5
Santa Fe, NM 87505

New Mexico Interfaith Power and Light
Ann Euston, Program Coordinator.
750 Vassar NE
Albuquerque, NM 87106

Nuclear Watch of New Mexico
Geoff Petrie
551 W. Cordova Rd., #808
Santa Fe, NM 87505

SouthWest Organizing Project
Michael Leon Guerrero
211 – 10th Street, SW
Albuquerque, NM 87102

Southwest Research and Information Center
Don Hancock
PO Box 4524
Albuquerque, NM 87196

Tribal Environmental Watch Alliance (TEWA)
J. Gilbert Sanchez
Rt. 5, Box 442-B
Santa Fe, NM 87506

Groups from outside of New Mexico:

Grandmothers for Peace, San Luis Obispo County Chapter

Molly Johnson, coordinator

6290 Hawk Ridge Place

San Miguel, CA 93451

Military Toxics Project

Tara Thornton

P.O. Box 558

Lewiston, ME 04243

Northwest Social & Environmental Justice Institute

Martin Yanez

PO Box 800

Granger, WA 98932

Uranium Recovery Education Project

Sarah M. Fields, Project Director

P.O. Box 143

Moab, Utah 84532